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Via Certified Mail/Return Receipt

Public Affairs Office – EA Comments
IMNE-MON-PA, Bldg.1207, Room G-07
Fort Monmouth, New Jersey 08625-0439

May 26, 2009
Job No. 2-60446-440002

Attn: Timothy Rider

**Re: Final Environmental Assessment
Finding of No Significant Impact Fort Monmouth
Closure at Fort Monmouth
Borough of Eatontown, Monmouth County, New Jersey**

Dear Mr. Rider:

Birdsall Engineering, Inc. (BEI) has been retained by the Borough of Eatontown (“Borough”) to review the above-referenced documents relating to economic and environmental matters within the Borough. As such, we are submitting the following comments on behalf of the Borough as part of the public comment period required by the National Environmental Policy Act. As Part of the Base Closure and Realignment Commission (BRAC) recommendations, portions of the base will be transferred to the Borough of Eatontown no later than September 15, 2011. Our comments concerning the Environmental Assessment (EA) are as follow:

1. Section 4.13, Hazardous and Toxic Materials, includes brief summaries concerning hazardous and toxic materials and the management of hazardous material and wastes at the Fort and references the *U.S. Army BRAC 2005 Final Environmental Condition of Property Report for Fort Monmouth, New Jersey (ECP)* report (U.S. Army 2007). In particular, the Fort Monmouth Installation Restoration Program (IRP) identifies environmental clean-up requirements at each Area of Concern (AOC) on the facility. During Phase I of the ECP, the Army has identified 43 IRP sites, and the majority is listed as “Response Complete”; the remaining sites still await resolution or approvals from the NJDEP. During Phase II ECP, an additional 27 AOCs were identified which are not addressed. To the best of our knowledge, neither BEEs nor IRPs have been prepared for these sites. Unknown and possibly objectionable economic and environmental impacts may result from the unresolved sites.
2. Some of the IRP sites that are listed as “response complete” are still being monitored for compliance with environmental standards. Monitoring data may indicate that additional investigative and monitoring work may be required to bring individual sites to compliance. How does the EA deal with these and other uncertainties?

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3. The alternative analysis includes scenarios under which the Army disposes of the property, including the "Caretaker Alternative" and the "No Action Alternative". Per the Draft Fort Monmouth Re-Use and Redevelopment Plan, the Borough will acquire several parcels, primarily greenbelt parks, recreational lands, and other public use lands such as Rights-of-Ways. The EA does not reflect the Borough's cost to maintain these public areas. In addition, portions of the greenbelt parks and open recreational areas contain former landfills or other sites requiring or undergoing remediation. It is unclear who would bear the costs of continued monitoring or any future remediation work on these lands. It should be noted that BEI, on behalf of the Borough, has submitted comments on permit applications for streambank stabilization plans submitted on behalf of the US Army to the New Jersey Department of Environmental Protection (NJDEP).
4. Section 4.9, Cultural Resources, concerns the existing cultural resources at Fort Monmouth. The Borough, having jurisdiction over properties located within the Borough limits, will be a signatory to the Programmatic Agreement (PA) between the Army, the New Jersey State Historic Preservation Office (NJSHPO) and the Advisory Council on Historic Preservation (ACHP). Furthermore, Section 4.9.2.1 states that the Borough will have the ability to seek enforcement of the provision of the PA if future landowners fail to comply with the preservation requirements included in the deeds. Was the historic status of buildings or sites considered in economic impact modeling or estimating real property tax revenue? Deed restricted property may be less desirable to developers and may be more costly to redevelop or renovate in order to retain historic features. Additional burden is also placed on the Borough's construction department to enforce the preservation requirements, as well as perform non-standard inspections.
5. Section 4.12, Utilities:
 - According to the Fort Monmouth Economic Revitalization Planning Authority (FMERPA), it might be preferable for a developer or the local water utility (New Jersey American Water, NJAW) to replace the water distribution system. In addition, NJAW cannot guarantee the availability of water at the time of development. Does the economic analysis include the infrastructure cost of constructing a new distribution system together with the proper abandonment of the existing distribution system and structures (i.e. water tanks)? Do the re-use alternatives take into consideration scenarios under which there is insufficient water capacity (due to either water allocation or infrastructure limitations) to support re-use?

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- Previous wastewater studies have documented relatively high infiltration and inflow rates into the sewage collection system, about 30% of the total flow. Additional sanitary sewer system studies are on-going. Does the economic analysis include the cost of repairing/replacing the sanitary sewer infrastructure together with the proper abandonment of existing sewer mains and structures?
- The storm water drainage pipes and inlets are in need of repair. Does the economic analysis include the cost of repairing/replacing the storm sewer infrastructure?
- Fort Monmouth purchases electricity from JCP&L and owns its own electrical power transmission and distribution network. There are five electrical substations at Fort Monmouth. JCP&L reported that customer-owned (Fort Monmouth) facilities generally do not meet its standards and JCP&L does not re-use them. Does the economic analysis include the cost of new electrical power infrastructure? Do the re-use alternatives take into consideration a scheduling lag in re-use or occupancy due to the lack of electrical or other utilities.

The EA is based on findings of the Phase I ECP report (EA, Section 4.13.1), and does not consider the impacts of 27 additional AOCs identified during the Phase II ECP. So far, no BEEs have been conducted at the additional sites, in accordance with the Requirements for Site Remediation (N.J.A.C. 7:26E-3.11). Furthermore, the EA does not address the environmental and economic impact of poorly maintained or inadequate infrastructure on redevelopment. The financial burden and potential liability for continued environmental monitoring are insufficiently addressed. In order to provide the receiving communities with complete information, the issuance of a Finding of No Significant (FNSI) should be postponed until a comprehensive Environmental Impact Statement can be prepared and reviewed.

Should you have any questions or require additional information, please contact me by phone at (732) 380-1700, Ext. 1227, or by e-mail: jpriolo@birdsall.com.

Very truly yours,

BIRDSALL ENGINEERING, INC.



James A. Priolo, P.E.
Borough Engineer

JAP:DDJ:kbh:ms

cc: Council President John Schiels
George Jackson, Business Administrator
Karen Siano, Borough Clerk
Dr. Arie P. Kremen, BEI